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March 14, 2022

**VIA ECF**

Hon. Magistrate Steven L. Tiscione  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East, Room 518  
Brooklyn, NY 11202

**Re: Munoz v. Kam Fung Wong, Inc., et al.**  
**Case No. 2:20-cv-04015 (ENV)(ST)**

Dear Judge Tiscione:

On behalf of Turck Law, P.C., I represent Defendants Kam Fung Wong, Inc. and Am Le Chang (“Defendants”) in connection with the above-referenced action. On February 24, 2022, this Court granted my proposed consent order granting substitution of attorney (Doc. No. 35) and I became counsel of record for Defendants. On March 3, 2022, I received the legal file from Defendants’ outgoing attorney.

I write, on consent of Plaintiff’s counsel, to respectfully request a sixty (60) day extension of the March 22, 2022 discovery deadline (i.e., May 21, 2022). Based upon my review of the docket, it appears that on three (3) prior occasions, former counsel requested an extension of the discovery deadline, all of which were granted by the Court. The present request is necessary to complete my review of the legal file and to complete any outstanding discovery, such as party depositions. In addition, the parties’ have recently made progress toward a hopeful settlement and desire to continue their settlement discussions. The requested extension, if granted, will facilitate these discussions.

In addition, on consent of Plaintiff’s counsel, I respectfully request a sixty (60) day extension of the April 22, 2022 dispositive motion deadline (i.e., June 21, 2022).

All parties are mindful of the need to timely complete discovery and do not anticipate any further requests for extension. Moreover, in the event that the parties are unable to settle this matter, we will reach out to the Court to schedule an additional settlement conference.

I thank Your Honor for your time and attention to this matter.

Respectfully submitted,

s/ Shawn A. Turck  
Shawn A. Turck, Esq.

cc: All Counsel via ECF